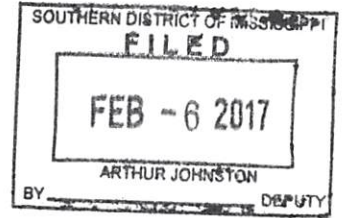


In the
UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF MISSISSIPPI



JOSE DE PAZ LOPEZ,
Plaintiff
v.
ELLIS J SALLIUM, M.D., and
NATCHEZ REGIONAL MEDICAL
CENTER,
Defendants

CIVIL ACTION NO.

5:17cv18-DCB-MTP

CLAIM UNDER FEDERAL RULE OF CIVIL
PROCEDURES, RULE 3

Comes Now, Jose Depaz Lopez, Plaintiff (hereinafter Plaintiff), and complain according to Federal Rules of Civil Procedure, Rule 3, in this action against Ellis J Salloum, M.D., and Natchez Regional Medical Center, for Medical Malpractice, under the following circumstances and facts as follows:

BACKGROUND OF MEDICAL CONDITION

Plaintiff is an Inmate serving a Federal Sentence, under the custody of a private contractor for the Bureau of Prisons, Department of Justice, Adams County Correctional Center at Natchez, Mississippi.

On May 5, 2013, at around 3:00 pm., I started having pain in my stomach. The following day on May 6, 2013, I went to sick-call at 6:00 am. (sick-call is the time when an inmate in at the Adams County Correctional Center, fill out a form to have the chance to be attended in the clinic of the Correctional Center where I'm incarcerated), I was attended by Nurse Russell who works at the clinic of Adams County Correctional Center, who gave me an appointment for 10:00 am that same day, to come back to the clinic to see the available Doctor. I returned to the clinic of Adams County Correctional Center at around 10:00 am. and was attended at around 10:30 am. by Nurse Russell from the Correctional Center clinic. I started telling Nurse Russell about the pain that started since the day before. I told him that I had pain in my stomach and lower right abdomen. I told him that the pain had increase during the night and I had trouble sleeping and could not find any kind of relief. Nurse Russell told me that all I had was and upset stomach and he just gave me a bottle of mylanta 30 mg. medicine. Even after I told him about my situation he did not perform any kind of physical examination. Nurse Russell sent me on my way and told me that if I got worse to report back to sick call the next day. Around 10:00 pm. that same day (May 6, 2013) I started to have a burning sensation inside my stomach area. The burning sensation was followed by an intense pain in my stomach and head. At that time another inmate went straight to the unit officer at the dorm and explain to the officer about my situation. The inmate told the officer that I should be taken to the hospital because my condition was getting worse. The officer's reply that, I would have to wait until after count in order to receive any kind of assistance.

About 30 minutes later, the unit officer called me to the door and escorted me to the Adams County Correctional Center clinic. While I was walking towards the clinic, I felt like I was dying. Once we arrived to the Correctional Center clinic there were two nurses, they started to talk me but I did not understand them. They used the phone translator (a system

the clinic uses to translate to inmates that don't speak the language) to be able to communicate with me. The translator told me that they could not help me because there was no doctor around the Correctional Center clinic at this time of the night. The nurse just gave me a sick call slip and told me to come back to the clinic the following morning. I told the nurses to please help me, I said I am in deep pain. The following morning, on May 7, 2013, I visited the Correctional Center clinic at 6:00 am. because the pain and the burning was too much and very painful. I was having a bitter taste in my mouth and then Nurse Russell gave me an appointment for 10:00 am.

Even thou Nurse Russell knew how bad my situation was, "that I was in very deep pain" at around 10:30 am. Nurse Russell called me into the examination room and asked me what was wrong. I repeated to Nurse Russell that I was in deep pain and I told him that I have a burning sensation in my stomach, at that moment Nurse Russell told me to lay down on the bed. Then Nurse Russell started to make an examination. When he touched the right lower side of my abdomen I shouted real load, because of the deep pain I had. At that point Nurse Russell called FNP Stacy Cook for assistance. Once inside the room the FNP Cook touched my lower right abdomen and the center of my stomach and I began to cry because the pain had become too much to bear with. Then FNP Cook and Nurse Russell started to talk among themselves. But I could not understand, but shortly after that Nurse Russell started filling out some paper work. Nurse Russell used the phone translator to communicate with me. Through the translator I learn that I was going to be taken to the local Hospital as an emergency to perform surgery.

Nurse Russell told me to wait in front of the Nurses station. From there I was taken to a cell inside the Correctional Center clinic, they knew full well that it was an emergency and I

had to wait 20 to 30 minutes inside that cell. A while later some officers came to dress me up and took me to the hospital in a van.

FACTS OVER CLAIM

I was handcuffed and toked the officers about 25 minutes to make it to Natchez Regional Medical Center in Mississippi (54 Seargent S. Prentiss Drive, Natchez, MS 39120 [Phone 601-443-2100]). Once at the Medical Center (hereinafter Hospital) I was in a waiting room waiting for the intake nurse. A nurse approached me asking me for some information but I did not understand her. From there I was taken to a room so I could lay down. They drew blood from me and then transferred me to another room and did a CT Scan. The doctor came in and asked me (with out translator) if I was allergic to any medication, I told him no. The doctor then asked me (with out translator) if I had any surgeries in the past, I said no. While the doctor was asking me questions I was so weak and I was feeling a lot of pain. Then the doctor touched the lower right side of my abdomen and I jumped because it was real painful. The doctor told me (with out translator) that this was an appendix problem that he was going to order surgery. A few minutes later I was taken to the operating room then someone just told me move to another bed but I could no longer move. Two doctors and a nurse and the two escort guards moved me to the operating bed. I was told that I was going to be put on some anesthesia and a mask was placed on my face and I did not know anymore about me.

I woke up the following day. I was in a recovery room and I saw myself with a

drainage tube in my lower right abdomen, I saw water and blood coming out of the tube. I also had a Foley on my Penis. I was in observation for about five days. A doctor and a nurse came to see me and the doctor asked me (with out translator) how I was doing. I told then not well, then I saw the doctor with a pair of scissors. The doctor told me (with out translator) that he was going to remove the drainage from the right lower abdomen and that it was going to hurt a little. The doctor began to cut the drainage tube and not a minute passed and then the doctor looked at the nurse and they began to talk to each other. I saw the doctor leave the room only to return with a lady that had a cell phone on her hand. That lady gave me the cell phone so I could speak to a translator. The translator told me that a problem had occurred. That while the doctor was trying to remove the drainage, he fail and a fragment fell inside my abdomen.

Then the translator told me that they were going to prepare me for another surgery to be performed on the morning of May 13, 2013.

At 7:00 am. they rushed me to the operating room to remove the fragment that the doctor left inside my abdomen. After the surgery the nurses and doctor were observing me for a couple of more days to see if I was getting better. I was feeling real weak and I had lost a lot of weight. Then a few days later I was transferred back to Adams County Correctional Center.

This complain, according to Federal Rules of Civil Procedure, Rule 3, is file against Ellis J Salloum, M.D. and Natchez Regional Medical Center, because of the malpractice when he began to cut the drainage tube while the doctor was trying to remove the drainage, and a fragment fell inside my abdomen, and since then it's being one health problem after another

health problem because of the liquids spelled inside my body and consequences of this bad performance by Ellis J Salloum, M.D. and Natchez Regional Medical Center.

CONSEQUENCES FROM THE FRAGMENT
THAT FELL INSIDE MY ABDOMEN

The following are facts of the painful health road that I have to go thru at the Adams County Correctional Center because this malpractice performed by Ellis J Salloum, M.D. and Natchez Regional Medical Center as follows:

After the second surgery performed by Ellis J Salloum, M.D. and Natchez Regional Medical Center, I started to get real dizzy, I visited the Correctional Center clinic on a sick call and Nurse Russell prescribed a dose of "Meclizine" 25 mg. tablets for the dizziness, then a time passed and around January 2014 I started to experience a strong pain in my abdomen; in those days the prison was on lock down status. I had filed a sick call slip while I was on lock down, but nobody attended me. I did not see anyone from the Correctional Center clinic. I then put a second sick call request, telling the Correctional Center Clinic that I had a strong pain in my abdomen.

Days later I was interviewed by Nurse Russell in the barbershop area from the unit due to the lock down, for the extreme pain in my abdomen, I explained to Nurse Russell that I was in a lot of pain in my abdomen and that it was hurting a lot when I would urinate. Nurse Russell told me that there was not much not he could do about it at that time. He

stated that all he could do was prescribe me some pain pills.

On May 22, 2014, I went to sick call at 6:00 am. then Nurse Russell gave me a 10:00 am appointment. I told Nurse Russell that I was with a lot of pain in my abdomen and my testicular region. Nurse Russell told me to watch out for a call out (It's a call that the Correctional Center uses every afternoon to notify the population the next day appointments that inmates have) because he was going to refer me to the doctor. I told Nurse Russell please help me out I am feeling real weak. I ask Nurse Russell to help me again and all he said that "is it for the moment". I felt like I was being ignored by Nurse Russell, he just did not care about my health. After that I was heading back to my dorm and I felt real dizzy. I was holding the fence tube while I was walking. After I passed the gym walkway, not far from my unit, everything went black. I fell to the floor unconscious.

The Correctional Center clinic staff came and placed me on a stretcher and rushed me to the Natchez Hospital. After I recovered, someone was there asking me a few questions. I was asked what had happened to me. All I told that person was that while I was walking to my dorm from the Correctional Center clinic and I lost consciousness. A nurse came and drew some blood from me. They did MRI and X-Rays. They also gave me a shot of morphine to reduce the pain I had. They had me in observation for about a week. After that they transferred me back to the prison complex. The pain went away because of the morphine. Then the symptoms came back, I documented all of my symptoms in a sick call slip, but all I get is pain pills and pills for infections. The Correctional Center clinic kept doing tests like for urine, blood and ultrasound. The Correctional Center clinic kept doing this tests but did not treat me for the multiple infections that I got since the surgery from my appendicitis. I always been reporting my situations via sick call and the Correctional Center

clinic has been ignoring me and denying me adequate medical treatment.

On September 21, 2014, I visited Correctional Center clinic because of the doctor call out, it was around 9:00 or 10:00 am. I was interviewed by doctor Joseph DiMaria from the Correctional Center clinic, he performed an exam in my abdomen and in my testicles. I told the doctor that I have a lot of pain and that two balls like water appeared in my testicles. Then Dr. DiMaria started checking my medical records and he found in my records were showing water in my testicles. I told Dr. DiMaria please help me because it hurts too much then the doctor stated by saying twice that "I promise you that I will help you out" I told Dr. DiMaria yes to please help me out because all the veins in my privates parts are getting black.

On October 10, 2014, I submit a sick call request at 6:00 am. because I was on extreme pain in the bottom of my stomach and in my testicles and in my legs. I was real dizzy after I put my sick call request. I saw Nurse Russell and he told me that I was going to see the doctor the following day which was October 11, 2014 I saw Dr. DiMaria, he asked me what was wrong with me I told him that I was real bad, then at that moment Dr. DiMaria put an order of pills "nitrofurantoin" 100 mg. This pills are used for infection and my infection is real bad.

On October 23, 2014 Dr. DiMaria ordered a urine test and on this day he told me that there was blood hidden in my urine. I told Dr. DiMaria to please help me with my health and I told him that I was having pain in the bottom of my stomach and that every time I urinate it was hurting me. I also told him that I have pain in my testicular region.

On November 4, 2014 while I was in my dorm, I started to vomit. Also I started feeling

like something hot that was burning the inside of my body. I lost my strength, at that moment I went to my bed, there I started having problem breathing, then from my mouth I saw some thick saliva, then I started to lose my conscious. The nurses came to my cell and transferred me to the Correctional Center clinic. Then I was rushed to the hospital via ambulance. A nurse came in to draw blood, then a CT scan was done on my head then of my abdomen. An x-ray was also done. I stayed in the hospital in observation for four days. I was then transferred back to the prison.

On December 1 2014, I once again lost my strength and once again felt a burning feeling all over my abdomen. I could not breath once again the nurses from medical department came into my cell. This time they transferred me via wheelchair to the Correctional Center clinic and put an oxygen mask for like 20 minutes. Finally the ambulance came and took me to Natchez hospital again. While I was in a hospital room a nurse came and took five tubes of blood. Again they took more CT scans. They gave me a shot of morphine to stabilize me. After that I was transferred back to the prison. I was in the Correctional Center clinic waiting for 30 minutes, a nurse came and gave me Amoxicilina 500% gm for infection and she told me that the doctor had order those pills and for me to take.

On December 9, 2014 Dr. Wood requested to see me, he ask me what was my problem I told him that my abdomen was on a lot of pain. Dr. Wood told me that he was going to examine me, he pressed my abdomen and asked me if it hurt. I said yes that I was in a lot of pain in my abdomen then Dr. Wood told me to lay down so he could do an examination. Dr. Wood press my abdomen with his hands in my lower right abs and left lower abs, then he asked me if it hurts. I said yes and I have a lot of pain. Then Dr. Wood exam my nose, face

and head, he asked me if it hurt I told him yes. Dr. wood told me I had "sinusitis", after that I told him that my testicular region hurts a lot. Dr. Wood told me to pull my pants down so he can check my testicular region. Dr. Wood begin to review my medical records. After that Dr Wood told me that I had liquid in my testicular region. I ask him to please help me out and I also told Dr. Wood that the veins in my testicular area are black. Dr. wood told me that he could see them. Dr. wood stated that he was going to order me an ultrasound and I never got the ultrasound. After that Dr. Wood asked me if the medical department had told me that I had an infection and a virus.

On January 16, 2015, It was around 10:30 am, I was in the kitchen sitting and waiting for my plate of food. I was sitting because I was feeling dizzy. I was feeling like I was burning inside my whole body. At that moment I lost all my strength, I could not breath and I lost consciousness. I fell in the kitchen floor and then the nurses came with a stretcher and took me to the Correctional Center clinic. The nurses put an oxygen mask so I could breath and after a few minutes I started to regain consciousness. I was feeling like I was dying and someone was telling me in my ears to wake up. Then someone came and pull the oxygen mask and then place a tube in my nose with some type of liquid that was so strong that it suffocated me. Then after that they place the oxygen mask back one and a nurse that was in front of me told me to open my eyes so they would have to put that liquid again in my nose and it was saying in Spanish by Nurse Juan Gonzaga, he said this three times. I told Nurse Juan Gonzaga that I did not have any strength then a nurse came making fun of me. Saying if I was inhaling pills through my nose then Dr Wood approached me with a flash light and perform an exam in my nose and inside my nose was red. Then Nurse Juan Gonzaga ask me who has been giving me pills, I told Nurse Juan Gonzaga that Dr. DiMaria had ordered pills for me and Nurse Juan Gonzaga asked me where do I have my pills. I told Nurse Gonzaga I

have them in my locker and they took all my pills. Then in Spanish Nurse Juan Gonzaga told me that the pills were giving me a bad reaction. Then Dr. Wood observe me till the ambulance came and took me in a rush to the hospital.

On January 29, 2015, I went to sick call at prison around 6:00 am. I requested to see the doctor. But I was seen by Nurse Russell. I explained to him that I was on a lot of pain and that I needed to see the doctor. Nurse Russell did not refer me to see the doctor even though he knows how delicate my health is. Then Nurse Russell gave me some pills that the urologist had prescribe for the infection in my testes "Sulfatrim" substitute for "Bactrim" and "Meloxicam" 15 mg tablet. Then Nurse Russell told me that I was going to be seen by the Doctor and I was never on the call out to see the doctor.

On February 13, 2015, at 6:00 am. I went to sick call, requesting to see the doctor because I was on a lot of pain in the abdomen and my testicular area and blood was coming out from my rectal area when I use the bathroom.

I was seen by Nurse Russell and he asked my what my problem was. I told Nurse Russell you know what my situation is, the whole medical department knows my situation. I once again began to explain to Nurse Russell of the extreme pain I was experiencing and that blood was coming out from my rectal area and Nurse Russell told me that's not what is written in the sick call. Then Nurse Russell asked me if I suffer from Hemorrhoids. I told Nurse Russell that I never had suffered from hemorrhoids. I told him that it was a misdiagnosis. Nurse Russell never asked for a doctors opinion for a diagnosis. Nurse Russell began reviewing my medical records and I told the nurse that my medical records reflect that I had "a very tiny diverticulum" and I told him please I need to see the doctor, Nurse Russell

told me yes you are going to see the Doctor. Then he left the examination room and told me to wait a moment.

When he came back to the room Nurse Russell said he was going to do the examination. He told me to pull my pants down and exterminate my "colon". Nurse Russell told me that it came positive with blood. He asked me since when did the bleeding happened. I told Nurse Russell I am not sure but I think like four or five months ago. Then Nurse Russell told me to check the call out because I was going to see the Doctor the following week. But I was never seen. All this happened on February 13, 2015 at 9:00 am. And all this conversation happened with a translator over the phone.

On February 18, 2015, I was placed in the call out sheet for 1:00 pm to pick up some pills. I received "Meclizine" 25 mg for dizziness and "Fluticazone Propiante" Nasal spay, usp 50 mcg per spray" this is insane. After I was told by Nurse Russell that I was going to see the Doctor and I was put on the call out was for pills.

On February 24 2015 at 9:00 am the medical department requested to see me. Nurse Cook asked me how I was doing. I told Nurse Cook that a few days earlier I was bleeding from my rectum. I told nurse Cook that I was in a lot of pain. I told nurse Cook that I found out that in my medical record it showed that I had a very tiny diverticulum. I told nurse Cook that probably that's why I was bleeding from my rectum. Nurse Cook started searching my records and then she told me that she could not find it in my medical records. I then told her I see you don't have it. I explain to Nurse Cook I got my medical records and I found it and it stated that I have a very tiny diverticulum. I also told Nurse Cook that I found out in my medical records that I have liquid in my lungs and I told Nurse cook that at night time I

was having trouble breathing. I told nurse Cook that Dr. DiMaria had said that he was going to put an order to get a machine so that I could breath. But I never received a machine to help me breath. Nurse Cook told me that she did not know anything about this, so I could help. After this nurse Cook told me to lay down so she could examine me. Nurse Cook check my rectum to see if there was any blood, Then she told me the results were negative.

Nurse Cook told me that she was going to do a follow up. Nurse Cook also told me that if the bleeding came back that for me to go to sick call. She also told me that the doctor was going to see me. She told me to check the call out. But the doctor never called on me.

I spoke to Nurse Cook via phone translator on February 26, 2015 at 8:30 am. While I was at the Correctional Center clinic, a nurse drew blood for an analysis.

On March 3, 2015, at 6:30 pm I reported to counselor Bird in my dorm, that I was bleeding in my rectum when I used the bathroom and I ask Counselor Bird to call medical to report. Because I was told by Nurse Cook that I should report it next time I would happen to find blood. Then Counselor Bird told me to wait outside the secretary office while she call medical Department. After Counselor Bird made the call to medical Department counselor Bird told me to go to medical. When I arrive at the medical Department a nurse was waiting for me then the nurse took my vitals. Then the nurse pressed my lower right abdomen. The nurse ask me if it hurt. I said yes then the nurse try to speak in Spanish but I could not understand her, then she put an interpreter in the medical department phone.

The interpreter asked me what my problem was. I then told the interpreter that earlier today I was using the bathroom and it was hurting a lot. I told the interpreter that because FNP Cook told me to report the next time I was bleeding from my rectum. The nurse that

was assisting me told me that she was going to call FNP Cook to communicate the situation that I had. The nurse told me to sit down and to wait in the waiting room. I saw the nurse calling FNP Cook on the phone after the nurse spoke with FNP Cook she told me to follow her to the examination room. There the nurse put the phone intercom. I started talking to the interpreter, the interpreter told me that I was going to spend the night in holding cell at the medical department. The nurse said that she was going to check on me while she made her rounds every two hours. The following day Dr. Wood began by pressing my lower left and right abdomen and when the doctor press my lower abdomen I was feeling a lot of pain. Then Dr. Wood ask why I had those surgeries, I told the doctor it was after the medical department let my appendix rupture and after all that my complications had gotten worse.

I told Dr. Wood that the day before blood was coming from my rectum and plus I was having a hard time using the restroom. Then doctor Wood told me that I was constipated and that was the reason I could not use the restroom. According Dr. Wood he was going to give me a liquid so I could use the restroom. Dr. Wood never gave me anything to help me use the restroom. After 4:00 pm Nurse Juan Gonzaga came to the cell at the medical department to ask me if I was doing good. I told him that I did not want to stay in the cell and for them to send me back to my dorm. Nurse Gonzaga told me that I had to stay for the night in the cell because the following day they were going to check me. The Following day around 5:30 am a nurse and an officer approached me. They told me that I was going to go back to the hospital. I was taken to a different in place to where I been had been this time, for the second time to the cardiologist.

I arrived at the hospital. A nurse took my vitals then I was escorted to a waiting room. I saw a doctor and he asked me if I speak English. I said no. the Doctor place my ear on a

phone then a translator told me that they were going to place a needle in my arm to put a liquid. Then they were going to put me in a machine to check my cardiac rhythm and that this exam was going twice. They told me first we are going to perform an ultrasound in my heart. Then after that they were going to check the cardiac rhythm. They put more liquid through the needle and then put some cables on my chest and my abdomen started hurting me. I was getting real dizzy and I was having problems breathing. I started to lose consciousness. The doctor and the officer saw that I was about to fall on the floor and they both held me all that happened in less than a minute. I was put in a wheelchair. They gave me water and cookies, I wanted to vomit then they put me on a stretcher for like 30 minutes.

When they put me back on the wheelchair and then the doctor came back and told me that my heart was okay, after that I was sent back to prison.

On April 1, 2015 I went to sick call. I was in a lot of pain in my abdomen and back. At 8:00 am I was called my Nurse Russell, he then began to ask me what was my situation. I told him that I was in a lot of pain, he check my pulse.(twice) Nurse Russell told me that I had high blood pressure. I requested to see the doctor, Nurse Russell did not answer me, when I told him that I needed to see the doctor. Then nurse Russell started to perform a urine test. After a few minutes Nurse Russell called me again and told me that I had blood in the urine. Nurse Russell gave this pill "Ciprofloxacin 500 mg tab" he told me that I must take two pills a day for ten days. He told me that they were going to check my pulse twice a week and if anything more needed to be done the Doctor will see to it. All this conversation took place with a phone translator.

On April 6, 2015, I wen to sick call at 6:00 am. and at 7:50 I was seen by Nurse Russell

and the reason I went to sick call was because I was in a lot of pain in my kidneys and my testes. I was real weak. Nurse Russell asked me what was happening. I told the nurse that for six days I had an extreme pain behind my back around the kidney area and my testicular region. I told him that I feel some burning inside my body. Nurse Russell asked if it hurt more in a certain position. I told him that sometimes when I moved and most likely the pain always is there and he ask me if I was taken the pills that he had given me. I told him yes (it hurts when you urine and your penis hurts asked Nurse Russell) I said yes. Nurse Russell checked my pulse and told me that it was high. He said that my pressure was still high and that for me to check the call out this week that one the doctors was going to see me, Then Nurse Russell gave me pain pills ibuprofen 200 mg. Then Nurse Russell told me that is it. All this conversation took place with and phone interpreter.

On July 11, 2016, I went to sick call because I had a lot of pain on my chest, stomach and I was bleeding from my rectum. Nurse Jason told me that the exam to check my colon and it was going to be real soon. But up to this date it has not happened.

On January 13, 2016, I was taken to the Hospital in Natchez ,Mississippi, so they could do an exam of my stomach and intestines. *The exam revealed that all my intestines are good and functioning. It also states that my appendix is normal and working good.* **My appendix was removed on May 7, 2013.**

On January 19, 2016, I was taken to South West Mississippi Regional Medical Center. so they could check through the inside of my stomach using a camera. *They found a dilated esophagus a hernia and a black shadow, the pain inside of me is too much to bear with.*

On February 10, 2016, a Friday I went to sick call for the same problem. I had a lot of pain on my chest and my throat. I was seen by Nurse Jason.

On February 24, 2016, I went to sick call because all of my body was hurting and Nurse Jason gave me an appointment at 9:00 am.

On March 2, 2016, I was seen by doctor Wood at 10:45 am. He told me that the exam on my stomach came back. I told him that the pain on my stomach was too much to bear with. He told me that he was going to change my pills but he never did.

On March 11, 2016, I went to sick call because my whole body was hurting and I was check by Nurse Russell.

On March 16, 2016, I went to sick call because my chest, and throat were hurting to an extreme. I was giving an 11:30 am. appointment, I was seen by Nurse Jason Russell, he check my mouth and told me I had an infection and gave me Amoxilina 500 mg.

On March 21, 2016, I went to sick call because of the infection in my mouth and the pain on my chest. I was checked by Nurse Russell. He gave me a 9:40 am. appointment, he told me that I looked better but I was still swollen from inside of my mouth.

On March 28, 2016, I went to sick call because of the pain on my chest, throat and mouth. Every day it was getting redder with white little specs. I was told by Nurse Russell that I was going to be seen by the doctor at 12:00 am.

On April 1st, 2016, I went sick call because the pain in my mouth and throat were too much. I told the nurse that my mouth was peeling from the inside and that I had white little point all over my mouth and throat. I was told that the doctor was going to see me the following week.

On April 6, 2016, at 1:00 pm. I was check by Nurse Cook. I told her that my mouth was peeling from the inside. She asked me how long I was having this problem. I told her since March of 2016. That it started around the same time that my chest started to hurt. I told her that the pain would travel up towards my throat. I also told he that my mouth was peeling from the inside and that the inside of my mouth is swollen. Nurse Cook told me that she was going to talk to Dr. Wood so he could check me. She told me to check the call out.

On April 13, 2016, I went to sick call because the pain in my throat, chest and body is too much. I was check by Nurse Russell he told me I was no longer swollen inside of my mouth. He told me that the doctor was about to seen me real soon.

On April 19, 2016, at 9:00 am I was seen by Doctor Wood for the pain in my throat and chest. The doctor told me that my mouth was irritated and that it was a little swollen. He asked me when had they done the exam using the camera to view my stomach. I told him on January 19th 2016 and that they found that my esophagus was swollen. I also told him that they also found and infection in my stomach. I also stated that there was a dark spot that they also located in my esophagus.

On May 3, 2016, I went to sick call because of the pain in my stomach and intestines. I was check by Nurse Russell, told me to buy some antacid pills from the commissary.

On May 5, 2016, They took blood twice without giving me any kind of results.

I went to sick call for the same pain on my abdomen. Because I was bleeding from my rectum. Nurse Russell checked me and told me that I was positive with blood on my rectum and that one of the doctors was going to see me.

I came out on the call-out for 8:00 am. I was check by nurse Cook at 8:45 am. She check my abdomen and told me that they were going to do a colon exam real soon. This was the second time that they told me that they were going to do the colon exam but just like the first time I was never checked.

On May 20, 2016, I went to sick call because of the pain on my throat. I was check and I was told that I was having an allergic reaction to the pills that were prescribed to me.

On May 31, 2016, I went to sick call because I was bleeding from my rectum. I was check by Nurse Russell and he found that I was found to be positive for blood in the rectum.

On June 6, 2016, I went to sick call again because of the pain. I was check by Nurse Russell.

On June 21, 2016, I went to sick call because of the pain on my testicles. I was check by Nurse Russell. He did a urine test and told me that the doctor was going to see me the following week.

I went to sick call because of the pain all over my body. This time I was checked by a nurse that I do not know. I was told that the following week I was going to be seen by the

doctor.

On June 27, 2016, I came out on the call out to see the Doctor. But when I arrived at the Correctional Center clinic a guard told me that there was a mistake because there was no Doctors present at that time. The guard told me that the Doctor was going to see me the following week.

On July 1st, 2016, I was told to go to medical so they could do draw blood and make a urine exam. That same day I went to sick call because of the pain on my chest and throat. They only check me but that's all they did.

On July 22, 2016, On this day medical had to go pick me up at the unit via stretcher. The reason behind that is that the pain I was feeling was too much to bear. A nurse came in and put an ammonia pack on my nose. I started to choke because of the ammonia was too strong then they told me that they were going to put me on a single cell for three days which it was not going to give any kind of results.

On August 2, 2016, I spoke to the warden of the Adams County Correctional Center again and I explained to him about the problems that I started to have after the operations. I told him about the pain that has never ceased. That all my inside hurt and burn. Around that same time Mr. Pitts (another boss for the Correctional Center) was passing by and the Warden sent him to attend me. Inmate Miguel Vela started to interpret for me. We went inside the Correctional Center clinic building and Mr. Pitts started to question the Nurse, and the Nurse told Mr. Pitts that they have already done everything they could for me. I told both of them that I have liquids in my body in places that I should not have any, and that these was the

result of the Malpractice Performed by Ellis J Salloum, M.D. and Natchez Regional Medical Center while the doctor was trying to remove the drainage, and the lack of health care giving at Adams County Correctional Center. I also told them that I was actually bleeding from my rectum when I used the restroom. I also told them that the pain that I have has never ceased since the fragment fell inside my abdomen, and that I need help to fully recover from the condition that I am in up to this day.

CONCLUSION

WHEREFORE, defendant requests this Honorable Court to process this complain according to Federal Rules of Civil Procedure, Rule 3, and order an indemnification for \$1,000,000.00 (One million Dollars), plus punitive damages for the rest of my life, or any other and further relief this Honorable Court deems just and proper, to keep treating my illnesses derived from this Malpractice executed by Ellis J Salloum, M.D. and Natchez Regional Medical Center, while the doctor was trying to remove the drainage, and the fragment fell inside my abdomen, resulting on all my health problems up to this day and, for the rest of my life (The Nurse from Adams County Correctional Center told Mr. Pitts that they have already done everything they could for me).

DECLARATIONS

I am the Plaintiff in this action, I declare under the penalty of perjury pursuant to 28

U.S.C.A. § 1746, that I have read the aforesaid Complain and know its contents, that I will present the evidence available at the proper time when this Honorable Court request them. The matters stated therein are true to my own knowledge, except as to those matters which are stated on information and belief and as to those matters I believe to be true.

Respectfully submitted this 27 day of January, 2017.



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